

**SEALED**  
**IN THE UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF TEXAS** **8**  
**HOUSTON DIVISION**

**United States Courts  
Southern District of Texas  
FILED**

DEC 13 2016

# UNITED STATES OF AMERICA

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David J. Bradley, Clerk of Court

V.

**CRIMINAL NO.**

**PEGGY ANN FULFORD  
a/k/a PEGGY KING,  
PEGGY WILLIAMS,  
PEGGY BARARD,  
PEGGY SIMPSON,  
PEGGY RIVERS,  
DEVON COLE, and  
DEVON BARARD**

16CR551

## **MOTION TO SEAL**

TO THE HONORABLE UNITED STATES MAGISTRATE JUDGE OF SAID COURT:

COMES NOW the United States of America, by and through Kenneth Magidson, United States Attorney for the Southern District of Texas, and the undersigned Assistant United States Attorney, and represents that:

An Indictment has been returned today charging defendant Peggy Fulford, a/k/a Peggy King, Peggy Williams, Peggy Barard, Peggy Simpson, Peggy Rivers, Devon Cole, and Devon Barard (“**FULFORD**”) with wire fraud, mail fraud, interstate transportation of stolen property, and money laundering, which carry punishment ranges in federal prison of up to 20 years for wire and mail fraud, and 10 years for interstate transportation of stolen property and money laundering.

The United States hereby requests that this Court seal the Indictment and the Court's file in and for the above-captioned case **until such time as FULFORD has been arrested or made her initial appearance, whichever occurs first.** In support of this request, the United States would show that defendant could take steps to avoid arrest, flee prosecution, and hide potentially forfeitable assets, so it seeks to arrest defendant before the return of the Indictment becomes publicly known.

The United States further requests that copies, including certified copies, of the Indictment and Arrest Warrant be provided to the United States Attorney's Office and the Federal Bureau of Investigation, which is the lead investigating law enforcement agency in this case, upon their request, and without further order of this Court.

WHEREFORE, PREMISES CONSIDERED, the United prays that this Court provide copies of the Indictment and Arrest Warrant to the United States Attorney's Office and the FBI upon request, and seal the Indictment and Court's file in and for the above-captioned case **until defendant has been arrested or has made an initial appearance, whichever occurs first,** at which time, the Indictment and Court's file will be unsealed automatically without further order of this Court.

Respectfully submitted,

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

By   
Belinda Beek  
Assistant United States Attorney